

FILED

OCT - 3 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISIN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAYMOND HARDGE, JR.,

Defendant.

4:19CR00815 AGF/PLC

No.

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Edward L. Dowd, III, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with two counts of felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g).
2. Pursuant to police reports, on March 12, 2019, officers with St. Louis Metropolitan Police Department responded to dispatch for a male and female arguing and a possible gun involved. Officers went to the scene and contacted defendant, who was alone in his vehicle. Inquiry revealed a warrant for defendant's arrest. A tow inventory revealed a black Colt .38 revolver in the glovebox. Defendant was arrested and Mirandized. Defendant said he knew the gun was in the vehicle but that it belonged to his girlfriend. Defendant also stated he has guns at his house because it

is in a dangerous neighborhood. Defendant's girlfriend, Brittany Isaacs came to the scene and said it was her gun, but did not know the make or model of the gun. She also stated defendant's DNA would be on the gun and that defendant handles the gun sometimes.

On May 19, 2019, a Hazelwood officer made a vehicle stop because it was missing a rear plate. Defendant, the driver of the vehicle, retrieved a brown and gold bag from the rear right passenger seat and got his wallet from inside. The officer smelled the odor of marijuana. Officers ran an inquiry of defendant which showed he was a prior convicted felon. Upon questioning defendant regarding the marijuana, defendant admitted he was smoking earlier. Defendant was asked to step out of the vehicle due to the odor of marijuana, but refused multiple times. Defendant was arrested for failure to comply with officer's instruction to exit the vehicle. A search of the vehicle revealed a PT111 9mm semi-automatic firearm in the glove box and a PT22 .22 caliber semi-automatic Taurus in the backpack that defendant had accessed his wallet. The firearm in the backpack was found to be stolen. Inside the bag was also men's cologne and a debit card with defendant's name on it. Defendant admitted it was his car during the interview. Defendant was interviewed on May 2, 2019 and admitted to handling the firearms before.

3. Defendant has a violent prior felony conviction:

September 29, 2003 for Robbery 1st, Kidnapping, Case# 03CR4740A, 21st Cir., 15 years

4. Pursuant to Title 18, United States Code, Section 3142(g),

- (a) the weight of the evidence against defendant;
- (b) defendant's criminal history and characteristics of the offense; and
- (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Edward L. Dowd, III
EDWARD L. DOWD III #61909MO
ASSISTANT UNITED STATES ATTORNEY